

Exhibit 1

TIMELINE RELEVANT TO PLAINTIFF'S DISCLOSURE OF WITNESSES

| Date | Witness/Event | Via/Doc |
|-------------|--|---|
| 3/23/22 | In her deposition, Pl. says she "ended up using my husband" in to access the CRO's "Go Back Letter." Pl. counsel objects re privileged comms, directs Pl. not to answer regarding communications that are privileged. Def. counsel says he is not interested in "communications," then states on the record that following up on Pl.'s husband's actions is "irrelevant" | Deposition of Lisamaria Martinez 74:11-75:3. |
| 4/11/22 | Original Close of Fact Discovery | Order to Extend Fact Discovery, ECF No. 41 |
| 5/13/22 | Pl. files declaration stating that her husband assisted with her form | Decl. of Martinez ISO Pl.'s Mot. for Partial SJ ¶ 4, ECF No. 45-1 |
| 10/5/22 | Joseph Bakker (Pl.'s husband) disclosed on witness list as part of pretrial exchanges | Pl.'s Exchanged Pretrial Disclosures |
| 10/20/22 | Court vacated pretrial and trial dates | Order for Plaintiff to File Motion for Summary Adjudication and Vacating Other Pretrial and Trial Deadlines, ECF No. 58 |
| 12/8/22 | Def. first reveals that it has a kiosk available at the CRO | Decl. of Yankee ISO Oppo. to Pl.'s Mot. for Summ. J. ¶ 3-4, ECF No. 63-3 |
| 12/22/22 | Marco Salsiccia disclosed | Pl.'s Suppl. Witness Disclosures |
| 12/22/22 | Lucia Greco disclosed | Pl.'s Suppl. Witness Disclosures |
| 7/10/23 | Pl. files amended complaint | Amended Complaint, ECF No. 84 |
| 7/13/23 | Court updates discovery deadlines | Case Mgmt. Order, ECF No. 87 |
| 7/24/23 | Def. files answer | Answer to Amended Complaint, ECF No. 90 |
| 9/29/23 | Joseph Bakker (Pl.'s husband) disclosed again | Pl.'s Second Suppl. Disclosures |
| 9/29/23 | Updated Close of Fact Discovery | Case Mgmt. Order, ECF No. 87 |
| 11/9/23 | Pl. deposes Cris Vaughan | |
| 11/16/23 | Def. deposes Karen McCall | |
| 11/16/23 | Def. deposes Steven Clark | |
| 11/21/23 | Def. deposes Eve Hill | |
| 11/30/23 | Updated Close of Expert Discovery | Case Mgmt. Order, ECF No. 87 |
| 1/25/24 | Grimm, Salsiccia, Greco, Bakker all disclosed again. | Joint Pretrial Appendix 1-2, ECF No. 105-1 |
| 3/25/24 | Jury Trial | Case Mgmt. Order, ECF No. 87 |